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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF ARIZONA**

9 Arizona Democratic Party,  
10  
11 Plaintiff,

12 v.

13 Arizona Republican Party, Donald J. Trump  
14 for President, Inc., Roger J. Stone, Jr., and  
15 Stop the Steal, Inc.,

Defendants.

No. CV-16-03752-PHX-JJT

**[PROPOSED] ORDER  
GRANTING PLAINTIFF'S  
MOTION FOR A TEMPORARY  
RESTRAINING ORDER AND/OR  
PRELIMINARY INJUNCTION**

16 This matter comes before the Court on Plaintiff's Motion for a Temporary  
17 Restraining Order and/or Preliminary Injunction. For the reasons set forth below, the  
18 Motion is GRANTED.

19 Plaintiff Arizona Democratic Party brings this action under Section 2 of the Ku  
20 Klux Klan Act of 1871, 42 U.S.C. § 1985(3), and Section 11(b) of the Voting Rights Act  
21 of 1965, 52 U.S.C. § 10307(b). Plaintiff moves to temporarily restrain and preliminarily  
22 enjoin Defendants from (a) advancing their conspiracy to intimidate, threaten, harass, or  
23 coerce voters; (b) actually intimidating, threatening, harassing, or coercing—or attempting  
24 to intimidate, threaten, harass, or coerce—voters; (c) violating Arizona law with respect to  
25 poll-watching activities; and (d) engaging in any other conduct contributing to the  
26 intimidation, harassment, or coercion of voters.

27 Having considered all of the materials and argument that have been submitted in  
28 this matter, including Plaintiff's Complaint and Memorandum of Law, IT IS HEREBY

1 ORDERED THAT, effective immediately and extending until 11:59 p.m., November 8,  
2 2016, or until voting in the 2016 Presidential Election is complete, Defendants—as well  
3 as their officers, agents, servants, employees, and attorneys, and those persons who are in  
4 active concert or participation with them—are RESTRAINED AND ENJOINED from  
5 engaging in any of their contemplated voter intimidation activity, including but not  
6 limited to:

- 7 1. Funding, encouraging, or otherwise supporting, including by training or  
8 organizing, individuals who are not officially appointed party  
9 representatives under Arizona law to be present at or around polling places  
10 or voter lines to challenge, investigate, interfere with, or otherwise act to  
11 prevent any person from voting, including but not limited to confronting  
12 potential voters and verifying their eligibility at the polls, distributing  
13 literature stating (and/or stating) to individuals that voter fraud is a crime, or  
14 describing the penalties under any State or Federal Statute for impermissibly  
15 casting a ballot.
- 16 2. Monitoring polling places, or permitting, encouraging, or assisting  
17 individuals to monitor polling places, including but not limited to  
18 confronting potential voters and verifying their eligibility at the polls,  
19 distributing literature stating (and/or stating) to individuals that voter fraud  
20 is a crime, or describing the penalties under any State or Federal Statute for  
21 impermissibly casting a ballot, if the proposed monitor does not comply  
22 with the statutory requirements for such monitoring activities under Arizona  
23 law; Gathering or loitering within seventy five (75) feet of a polling place,  
24 or permitting, encouraging, or assisting any individuals to gather or loiter  
25 within seventy five (75) feet of a polling place, unless such person is one of  
26 the appointed party representatives who may be present in a polling place at  
27 any time;  
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3. Questioning, interrogating, or verbally harassing voters or prospective voters, or training, organizing, or directing others to do the same, with the sole exception of questioning that is explicitly authorized by Arizona law;
4. Following, taking photos of, or otherwise recording voters or prospective voters, those assisting voters or prospective voters, or their vehicles, or training, organizing, or directing others to do the same.
5. Questioning, and training, organizing, or deputizing any persons to question, voters at Arizona polling locations under the guise of the purported “exit polling” or “citizen journalist” operations organized and encouraged by Defendants Stone and Stop the Steal;
6. Otherwise organizing efforts to engage in voter intimidation.

IT IS FURTHER ORDERED THAT this Order be publicized to all law enforcement and elections officials in advance of Election Day. Defendants shall bear reasonable costs of publication.

IT IS FURTHER ORDERED THAT Defendants shall show cause as to why a Preliminary and/or Permanent Injunction should not issue restraining and enjoining them from engaging in the conduct described above.